

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
CONNIE BRAUN CASEY, individually,
ANDREW SAWYER, individually, and
JANE DOE 2,**

Plaintiffs,

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC. and
ANGELA SCOTT a/k/a ANGELA G.
CAGNASSO, individually,**

Defendants.

Case No. 4:16-cv-02163

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, “Plaintiffs”). I make this declaration based upon my personal knowledge and upon information available to me as Plaintiffs’ counsel.

2. On July 11, 2018, following my discussion regarding potential settlement with Daniel Batten, then-counsel for Counterclaim Defendant Connie Braun Casey (“Casey”), I sent propose settlement terms to Batten and his co-counsel, Brian Klar.

3. On July 20, I received an e-mail from Kristen Bonn, secretary to Klar, under Klar’s signature, rejecting certain settlement terms proposed by Plaintiffs. The e-mail did not contain a counterproposal acceptable to Plaintiffs.

4. On July 23, I sent a response to the July 20 e-mail, informing Klar and Batten that their July 20 response to Plaintiffs' proposal was inadequate. I received no response.

5. On August 1, I again contacted Klar and Batten with a proposal for settling the case. I also informed them that Casey's failure to participate in discovery had been preventing a timely settlement. I did not receive any response to this email, either, despite my efforts following up via both email and voicemail.

6. On September 4, following the withdrawal of Klar and Batten, I sent Plaintiffs' proposed settlement terms directly to Casey. I have received no response to that correspondence.

7. On September 7, Plaintiffs served a subpoena upon Lisa Harned, Casey's daughter and former named secretary of Missouri Primate Foundation. Ms. Harned's neighbor informed the process server that Ms. Harned could be found at Casey's residence, where Ms. Harned reportedly has been living with and caring for "her ailing mother," Casey.

I declare under the penalty of perjury that the foregoing is true and correct.

September 9, 2018

Los Angeles, CA

/s/ Jared Goodman
Jared Goodman